

IN THE CIRCUIT COURT OF MARYLAND FOR PRINCE GEORGE'S COUNTY

JOHN WILLIAMS
453 Valley Ave SE
Washington, DC 20032

Plaintiff,

V.

INTEKHAAB CHAUDHRY
7816 Belford Drive
Apartment 301
Alexandria, VA 22306

Defendant.

Case No. C-16-CV-23-005065 AG

COMPLAINT

COMES NOW, Plaintiff, John Williams, by and through undersigned counsel, brings this civil action against Defendant, Intekhaab Chaudhry, and states as follows:

Jurisdiction and Parties

1. Plaintiff is an individual who is over the age of 18 whose domicile is in Washington D.C.
2. Defendant is an individual who is over the age of 18 whose domicile upon information and belief is in Alexandria, Virginia.
3. All of the events alleged in the foregoing complaint occurred in Oxon Hill, Prince George's County, Maryland.
4. Jurisdiction is proper in this Court pursuant to MD. CODE ANN., Cts. & Jud. Proc. § 6-102.
5. Venue is proper in Prince George's County, Maryland pursuant to Cts. & Jud. Proc. Art. § 6-201(a).

COUNT I

(Negligence Causing Personal Injuries)

6. Plaintiff incorporates by reference paragraphs 1-5 as if set out in full herein.
7. On or about December 10, 2020, the Plaintiff, John Williams was operating a motor vehicle with due care, eastbound on Wheeler Road, at or near its intersection with Manor Drive in Oxon Hill, Prince George's County, Maryland. On the same date and time, the

Defendant was operating a motor vehicle westbound on Wheeler Road. Suddenly and without warning, the Defendant negligently drove his vehicle into the side of the Plaintiff's vehicle, thereby causing a collision, and further causing the Plaintiff to sustain serious personal injuries. The Plaintiff neither caused nor contributed to the collision or his injuries.

8. The Defendant failed to pay full time and attention to the operation of his vehicle, failed to keep a proper lookout, failed to operate his vehicle at a reasonable speed, failed to control his vehicle, failed to brake timely, failed to operate his vehicle so as to avoid a collision, failed to see what was there to be seen, and operated his vehicle recklessly, and with a reckless disregard for the consequences of such operation, and with a disregard for the rights and safety of the Plaintiff and others, and in a manner likely to endanger the person and property of the Plaintiff and others.
9. The Defendant operated his vehicle in violation of the motor vehicle and traffic laws of the State of Maryland. It was the duty of the Defendant to operate his vehicle in a careful and prudent manner with due regard for the safety of other persons; notwithstanding that duty, the Defendant operated his vehicle in a negligent manner, and with a disregard for the safety of the Plaintiff.
10. As a direct and proximate result of the negligence of the Defendant as aforesaid, the Plaintiff has suffered, and will continue to suffer, severe and permanent physical injuries, permanent disability, great pain and suffering, and great mental anguish and emotional distress.
11. As a further result of the negligence of the Defendant as aforesaid, the Plaintiff has incurred, and will continue to incur, substantial medical and related expenses, transportation costs, loss of earnings, permanent impairment of his earning capacity, loss

of employment opportunities, loss of time and enjoyment from his usual and customary leisure and recreational activities, and permanent impairment of his usual and customary leisure and recreational activities.

WHEREFORE, Plaintiff, John Williams, demands judgment from and against Defendant, Intekhaab Chaudhry, for compensatory damages in an amount **in excess of Seventy-Five Thousand Dollars (\$75,000.00)**, with interest and costs.

Respectfully submitted,

/s/ Taylor D. Comstock
Taylor D. Comstock (#2111230004)

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ATTORNEY FOR PLAINTIFF

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Defendant.

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The Plaintiff, John Williams hereby demands a trial by jury in the above-captioned matter.

Respectfully submitted,

/s/ Taylor D. Comstock

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V.

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Defendant.

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ATTORNEY CERTIFICATE

I hereby certify that I am a member in good standing of the Maryland Bar.

Respectfully submitted,

/s/ Taylor D. Comstock
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